

# **Exhibit 1**

**Lightfoot, Jewel M (CIV)**

**From:** Lightfoot, Jewel M (CIV)  
**Sent:** Friday, February 14, 2025 9:27 AM  
**To:** Cary McGehee; Patrick Lanciotti; Paul Napoli; Julie Hurwitz; deborah labelle  
**Cc:** Corsentino Burtch, Katlyn C (CIV); Domingue II, Michelle T (CIV); Eagles, Daniel C. (CIV); Gonzalez, Heidi (CIV); Lightfoot, Jewel M (CIV); Rey, Eric A. (CIV); Cohen, Jason T. (CIV); Michael.L.Williams@usdoj.gov; Walthall, Timothy (CIV); Glynn, J.Patrick (CIV); Falk, Christina (CIV)  
**Subject:** Response to motion to compel meeting

Tracking:	Recipient	Delivery	Read
	Cary McGehee		
	Patrick Lanciotti		
	Paul Napoli		
	Julie Hurwitz		
	deborah labelle		
	Corsentino Burtch, Katlyn C (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 9:35 AM
	Domingue II, Michelle T (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 10:25 AM
	Eagles, Daniel C. (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 9:31 AM
	Gonzalez, Heidi (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 9:48 AM
	Lightfoot, Jewel M (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 10:10 AM
	Rey, Eric A. (CIV)	Delivered: 2/14/2025 9:27 AM	
	Cohen, Jason T. (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 10:02 AM
	Michael.L.Williams@usdoj.gov		
	Walthall, Timothy (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 9:58 AM
	Glynn, J.Patrick (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 6:39 PM
	Falk, Christina (CIV)	Delivered: 2/14/2025 9:27 AM	Read: 2/14/2025 10:06 AM

Cary, Patrick, *et al.*,

As we discussed at our meeting yesterday the United States spoke with Gradient Corp. and Dr. Goodman. They have agreed to provide you with the following information requested in your motion to compel: "(1) Dr. Goodman's salary/compensation for the years she was retained by the USA in this case, (2) her base salary and bonuses, (3) her yearly revenue goals, and (4) additional compensation received by Dr. Goodman based on a percentage of billings she generated in this case."

The United States can provide this to you in the form of an affidavit, addendum to the already provided Rule 26 disclosures, as a response to requests for production, or as a response to an interrogatory request.

This information will be provided subject to the confidentiality requirements in the Protective Order (ECF No. 121) issued in this case.

V/r,



**Jewel Morris Lightfoot IV**  
**Trial Attorney**  
**U.S. Department of Justice**  
**Civil Division, Environmental Torts**  
**202-616-4355 (Office)**

[REDACTED]  
Jewel.M.Lightfoot@usdoj.gov